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September 27, 2021

Via ECF

Hon. Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Speakes v. Taro Pharmaceutical Industries, Ltd. et al., Case No. 16-cv-08318-ALC-OTW

Dear Judge Wang:

In the above-referenced action, we respectively represent Lead Plaintiff City of Atlanta Firefighters' Pension Fund and defendants Taro Pharmaceutical Industries Ltd., Michael Kalb, and Kalyanasundaram Subramanian. We are submitting this joint status letter pursuant to the order entered on September 10, 2020 (ECF No. 79).

Pursuant to a stipulation so-ordered by Your Honor on April 17, 2019 (ECF No. 76) (the "Stipulation"), fact discovery in this action is presently coordinated as described in the Stipulation with discovery in the multidistrict litigation in the Eastern District of Pennsylvania captioned *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, No. 2:16-md-2724 (the "MDL"), and otherwise stayed. Fact discovery remains ongoing in the MDL. In accordance with the Stipulation, defendants have produced more than 214,000 documents in this action to date and are continuing to make productions pursuant to the Stipulation.

The parties are available to address any questions the Court may have.

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Respectfully submitted,

BERNSTEIN LIEBHARD LLP

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Firefighters' Pension Fund and the
Proposed Class*

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Industries Ltd., Michael Kalb, and
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cc: Counsel of record (via ECF)